



October 22, 2015

The Honorable William H. Orrick
United States District Court
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *National Abortion Federation v. Center for Medical Progress, et al.*
Case No. 3:15-cv-03522

Dear Judge Orrick:

Counsel for Defendant Troy Newman have just learned that videos likely covered by the TRO are appearing on the Internet. Defendant Newman did not make, or participate in, this disclosure. One report states that the videos were obtained from "a source on Capitol Hill" but Defendant Newman has no knowledge concerning how this disclosure happened.

Sincerely,

A handwritten signature in black ink that reads "Erik Zimmerman".

Erik Zimmerman
Counsel for Defendant Troy Newman
Admitted pro hac vice

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